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Attorneys for Defendant

ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

JAMIL HADDAD and GHADA HADDAD,

Plaintiffs,

v.

ALLIED PROPERTY AND CASUALTY  
INSURANCE COMPANY and DOES 1 to 25,

Defendants.

) Case No. 3:09-cv-01370-EDL

) **STIPULATION TO CONTINUE CASE**  
) **MANAGEMENT CONFERENCE, TO**  
) **EXTEND DEADLINES, AND TO**  
) **CONTINUE TRIAL DATE;**  
) **[PROPOSED] ORDER**

Plaintiffs Jamil Haddad and Ghada Haddad (hereinafter, "Plaintiffs") and Defendant Allied Property and Casualty Insurance Company ("Allied") hereby submit the following stipulation to continue the further case management conference statement, to extend various deadlines, and to continue the trial date.

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**RECITALS**

WHEREAS, the Court approved the parties' choice to proceed to private mediation as their selected mode of alternative dispute resolution; and

WHEREAS, the parties have retained Charles A. Dyer, Jr., Esq., of Dyer & White of Menlo Park, CA, to act as mediator; and

WHEREAS, in light of the respective schedules and prior commitments of the parties, counsel, and Mr. Dyer, the parties have not, as of this writing, been able to proceed to mediation and will not be able to do so prior to the next schedule case management conference on October 6, 2009; and

WHEREAS, the respective trial calendars of Plaintiffs' counsel and Allied's counsel will not permit the parties to proceed to mediation until November 16, 2009 or later,

The parties, by and through their respective counsel of record, hereby stipulate as follows:

**STIPULATION**

1. That the further case management conference presently scheduled for October 6, 2009, be continued 60 to 90 days;
2. That the deadlines outlined in the Court's Case Management and Pre-Trial Order for Jury Trial be continued 60 to 90 days, including:
  - a. The deadline of November 2, 2009, for disclosure of experts;
  - b. The deadline of November 16, 2009, for rebuttal expert disclosures;
  - c. The deadline of December 1, 2009, for completion of non-expert discovery;
  - d. The deadline of January 26, 2010, for completion of expert discovery; and
  - e. The deadline of January 12, 2010, for hearing of dispositive motions;
3. That the pretrial conference date of March 23, 2010, be continued 60 to 90 days; and

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4. That the trial date of April 5, 2010, be continued 60 to 90 days.

Dated: September 29, 2009

Respectfully submitted,

LAW OFFICES OF JOHN FITZPATRICK VANNUCCI

By /s/ John Fitzpatrick Vannucci  
John Fitzpatrick Vannucci  
Attorney for Plaintiffs  
Jamil Haddad and Ghada Haddad

Dated: September 29, 2009

LEWIS BRISBOIS BISGAARD & SMITH LLP

By /s/ Stephen J. Liberatore  
Julian J. Pardini  
Stephen J. Liberatore  
Attorneys for Defendant  
Allied Property and Casualty Insurance Company

**ORDER**

Having read and considered the recitals and the stipulation of the parties set forth above,  
and finding good cause therefor,

**THE COURT HEREBY ORDERS AND DECREES** that the further case management  
conference scheduled for October 6, 2009, be and hereby is, **CONTINUED**. Further,

**THE COURT HEREBY ORDERS AND DECREES** that the deadlines and trial date set  
forth in the Court's Case Management and Pretrial Order for Jury Trial be and hereby are,  
**VACATED**, and re-set as follows:

Further Case Management Conference:	<u>Decembr 15, 2009 at 10:00 AM</u>
Expert Witness Disclosure:	<u>January 8, 2010</u>
Rebuttal Expert Witness Disclosure:	<u>January 22, 2010</u>
Completion of Non-expert Discovery:	<u>February 5, 2010</u>
Completion of Expert Discovery:	<u>March 31, 2010</u>
Hearing for Dispositive Motions:	<u>March 16, 2010 at 9:00 AM</u>

Pre-trial Conference: May 25, 2010 at 2:00 PM  
Jury Trial (not more than 10 days in length): June 14, 2010 at 8:30 AM

IT IS SO ORDERED.

Dated: September 29, 2009



**FEDERAL COURT PROOF OF SERVICE**

**JAMIL HADDAD and GHADA HADDAD v. ALLIED PROPERTY & CASUALTY  
INSURANCE COMPANY, and DOES 1 to 25**

United States District Court - Northern District of California  
Case No. 3:09-cv-01370 EDL

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and not a party to the action. My business address is One Sansome Street, Suite 1400, San Francisco, California 94104.

On September 29, 2009, I served the following document(s):

**STIPULATION TO CONTINUE CASE MANAGEMENT  
CONFERENCE, TO EXTEND DEADLINES, AND TO  
CONTINUE TRIAL DATE;  
[PROPOSED] ORDER**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

John F. Vannucci  
Law Offices of John Fitzpatrick Vannucci  
120 Montgomery Street, Suite 1600  
San Francisco, CA 94104  
Attorney for Plaintiffs  
Phone: (415) 981-7500  
Fax: (415) 981-5700

The documents were served by the following means:

☒ (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 29, 2009, at San Francisco, California.

  
MAUREEN LIU